UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

IN RE:) CASE NO. 10.25270 KI D
Taft Stewart, Jr. Joyce Stewart) CASE NO. 10-35370-KLP)
) CHAPTER 13
Debtor(s))))
Wells Fargo Bank, N.A.	Plaintiff
Vs.	
Taft Stewart, Jr.	
Joyce Stewart	Debtor(s)

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Now comes the Debtor(s) in this matter, by counsel, and as and for Debtor(s) Response to the PLAINTIFF's Motion for Relief from Automatic Stay filed on 12/11/13, says as follows:

1. That they deny the allegations contained in paragraphs 9 and 10 of the Motion and ask for strict proof thereof.

WHEREFORE, Debtor(s) respectfully move the Court that the Motion be denied.

Respectfully submitted:

Taft Stewart, Jr.

Joyce Stewart
BY: /s/ Richard J. Oulton
Counsel

Richard J. Oulton, VSB#29640 Linda D. Jennings, VSB#19455 The America Law Group, Inc. 2312 Boulevard Colonial Heights, VA 23834 Phone: (804) 506-0177

fax: (804) 201-4707

Certificate of Service

I certify that on December 27, 2013, I sent a true copy of the foregoing Answer by ECF transmittal, first class mail, postage prepaid, via e-mail or fax to the following parties:

Brandon R. Jordon, Esquire 1804 Staples Mill Road, Suite 200 Richmond, VA 23230

Carl M. Bates, Chapter 13 Trustee

/s/ Richard J. Oulton Richard J. Oulton